

BILL OF COMPLAINT

HESBIA C. FOSTER, T/A
ACME CONSTRUCTION COMPANY
COMPLAINANT

: NO. 18097 EQUITY
: IN THE CIRCUIT COURT FOR
: FREDERICK COUNTY, IN EQUITY.

VS.

HAZEL CALDWELL, WIDOW;
NINA BROWN, WIDOW;
WILBUR JOHNSON, UNMARRIED;
IRVING JOHNSON, UNMARRIED;
THENA JOHNSON, UNMARRIED;
MARION JOHNSON, UNMARRIED;
EMANUEL W. JOHNSON AND RUTH
JOHNSON, HIS WIFE;
JOHN ROGER JOHNSON AND ALICE
JOHNSON, HIS WIFE;
FANNIE GRIFFIN AND HENRY GRIFFIN,
HER HUSBAND;
RUTH JOHNSON, UNMARRIED;
JAMES JOHNSON, UNMARRIED;
ANNA JOHNSON, UNMARRIED; and
HAZEL MACIVER, HEIRS AT LAW AND
NEXT OF KIN OF JOHN JOHNSON,
DECEASED AND MARTHA FLORENCE JOHNSON,
DECEASED
DEFENDANTS

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Hesbia C. Foster, t/a Acme Construction Company,
by W. Jerome Offutt, his Solicitor, respectfully shows unto your Honorable Court:
FIRST: That he contracted with the Defendants, or their agents and represent-
atives, to furnish the work, labor and materials in connection with the repair
and improvement of a dwelling house on a lot of ground of which the said Hazel
Caldwell, widow; Nina Brown, widow; Wilbur Johnson, unmarried; Irving Johnson,
unmarried; Thena Johnson, unmarried; Marion Johnson, unmarried; Emanuel W.
Johnson and Ruth Johnson, his wife; John Roger Johnson and Alice Johnson, his wife;
Fannie Griffin and Henry Griffin, her husband; Ruth Johnson, unmarried; James
Johnson, unmarried; Anna Johnson, unmarried and Hazel MacIver, heirs at law and
next of kin of John Johnson, deceased and Martha Florence Johnson, deceased, were
the owners or the reputed owners, situate, lying and being in Buckeystown District,
Frederick County, Maryland, the said work, labor and material to be paid for in
cash on the completion of the said job.

SECOND: That he has fulfilled his part of the said agreement and furnished
the materials which were used in the improvement and renovation of said building
and has performed the work and labor in said improvement and renovation afore-
mentioned.

W. JEROME OFFUTT
ATTORNEY AT LAW
FREDERICK, MD.